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Ravalli County Commissioners

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Travel Management Planning Team

Bitterroot National Forest

88 Main

Stevensville, MT 59870

To Whom It May Concern:

This letter is in response to the Draft Travel Management planning for over-snow aspects of the Proposed Action for Travel Planning issued by the Bitterroot National Forest.

Over the past 35 years the public land management trend has been to close access to and use of public lands. This trend of closure upon closure has become an epidemic and is out of control as demonstrated by popular public opinion. It has caused severe impacts on the last from these closures.

I am a very frequent visitor to the Bitterroot National Forest as well to adjacent forests in Montana and Idaho. I am also a hiker, angler, hunter, camper, OHV rider, snowmobiler, and horseback rider. I visit both the Wilderness areas and non-Wilderness areas. I am also a very close landowner to the Wilderness Area.

There is no recreational activity on the forest that is friendlier to the resource and wildlife than a snowmobile. Over-snow travel by snowmobiles leaves virtually no trace at all in the forest. Travel by snowmobiles is most frequently accomplished in alpine areas that are inaccessible to other forest users. There is no credible evidence that the operation of snowmobiles at high elevations influenced the habitat of the few species of wildlife that winter in there elevations. There has been proven research studies done in Wisconsin, Maine, Minnesota, Montana, Wyoming and Yellowstone Park that wildlife is not disturbed by heavy snowmobile use. But by a hiker, cross-country skier, or a snowshoer the animals want to flee.

Motorized visitors are continually losing significant recreational opportunities by conversion of multiple-use areas to non-motorized areas. I am greatly concerned about the significant cumulative impact associated with the reduction of multiple-use and OHV recreation opportunities. I do not expect to have the freedom to go anywhere and do anything that I want. However, we are losing the basic freedom to travel to places and experience outdoor opportunities that the public has benefited from for decades. We are losing routes that grandfathers and fathers have taught sons and daughters and even grandchildren to ride and

recreate on. The continual loss of motorized access and recreational opportunities and the negative attitudes toward multiple-use recreationists is seriously degrading our culture and quality of life. I am opposed to any proposed action that further contributes to this significant cumulative impact on multiple-use and OHV recreationists. Recreation opportunities for multiple-use and OHV recreationists are being significantly reduced at a time when the need for these categories of recreation is growing. There is not reasonable justification for closing these lands to multiple-uses. Management of public lands for multiple-use is the most equitable and responsive approach available to meet the needs of all citizens including motorized recreationists.

Snowmobiling provides a wonderful opportunity for recreational access in the winter.

There is usually no conflict between snowmobiles and non motorized users during the hunting season.

Snowmobiles do not have an effect of spreading noxious weeds. Research done in Maine as concluded that snowmobile trails plays an important role in the survival of the state's most beautiful flora. It is a fact that a snowmobile and rider exert dramatically less pressure on the earth's surface than any other recreation activities. Keeping snowmobile recreational activates as widely dispersed on the forest as is possible in order to avoid stress to the resource is one of the most fundamental principles of recreational Forest management. How the Bitterroot National Forest proposes to comply with this principle by crowding an increasing population of snowmobilers into smaller areas and onto fewer routes defies all logic and reason. The Proposed Action is simply an example of very bad forest management.

Many of the areas and routes proposed for closure to snowmobile travel in the Proposed Action appear to be based on the Bitterroot National Forest Revision to the Forest Land Management Plan. This is inappropriate and illegal. The Forest Land Management Plan Revision is NOT in place. It may NOT be in place for many years or another plan may be drawn up. You cannot base this Travel Management Plan on a process whose outcome is unknown.

The BNF Management Plan that is currently in place is the 1987 plan. This plan does not prohibit operation of snowmobiles in Recommended Wilderness Areas and it is therefore unlawful for the BNF to close any area or trail because it lies within Recommended Wilderness Areas or "Comes close to" Designated Wilderness Areas.

Current laws, rules, and policies permit the operation of snowmobiles in WSA's in areas on routes established prior to the passage of the Montana Wilderness Study Act. Closure of any of these areas or routes because they lie within a WSA is unlawful!

Many routes and areas identified in the Proposed Action are recommended for closure to snowmobiles because they are adjacent to or near Designated for Recommended Wilderness Areas. There is no law, rule, or policy currently in place that permits closures on this basis. If an area or route is recommended for closure to “preserve the wilderness character” of a Designated Wilderness area, it is necessary to document the violations. This information must be made available to the public to validate the data.

Closing a route or area is unlawful.

There are vague references to “expressed concerns” about supposed impacts of snowmobiles on wildlife. As stated above, snowmobiles do not impact wildlife. Again where is your *documented information* and made available to the public. This does not give adequate evidence to close an area.

Skalkaho Basin

The Proposed Action calls for the seasonal closure of snowmobiles routes in this area during hunting season. This is one of few early accessible areas on the entire forest that has early snow to support snowmobiling. The Forest Service should honor their prior agreements and leave this area open.

Lost Horse Area

The Proposed Action closes most of the Lost Horse Area apparently in anticipation of the outcome of the Forest Plan Revision. This is another early accessible snow area for snowmobiles. Snowmobiles have enjoyed this area for several decades and should continue to do so. This area needs to stay open for snowmobilers because of the high recreational opportunities in.

Former Darby Lumber Sections

This large area is a clear-cut area. They offer acres of play areas for snowmobiles for family recreating. There are no user conflicts and no effects on wildlife in these areas. This area needs to be kept opened to snowmobiles.

Trail 313

Portions of Trail 313 have been used by snowmobiles for decades. The Proposed Action recommends closure of Trail 313 from its intersection with Trail 39 northward. This trail needs to stay open. This trail has always been open to motorized use. This surrounding area is a great snowmobiling usage area.

Blue Joint Area

The Proposed Action recommends closure of the Blue Joint area and Trails 614 and a portion of Road 44. Road 44 is controlled by the Salmon National Forest in their Proposed Action that road is to stay open indefinitely. Trails 614 and 627, among others, "to preserve wilderness character", there are no laws, rules, or plans currently in place that permit this closure for these reasons.

The Blue Joint Trail 614 forms one leg of a series of highly valued snowmobile loops. This area needs to remain open to snowmobile traffic. There is no adverse resource of wildlife impacts and no user conflicts.

It is inappropriate that the Forest Service decreases the miles of snowmobile travel in the Bitterroot National Forest. This rapid growing sport has very little impact on nature and wildlife. Areas being proposed for closure need to be left open for the public to enjoy.

We do not need more Wilderness in the Bitterroot National Forest. The Wilderness here is already in our back doors. We have enough wildfire burning in our back door with no means of controlling the wildfires without thousands of more acres added into the new proposed plan. Fires will now be burning into our back doors and our urban towns. What happened to the urban interface that the Forest Service was going to manage? There are enough quiet areas for those types of users. Shutting down areas for snowmobile use will cause more conflict with quiet users as they can't travel as far into the Forest.

Please note following areas of concern to me:

CAMAS/KIDNEY LAKE CLOSURE; LICK CREEK/NORTH OF COMO LAKE;
HARLAN/BLACKTAIL/LITTLE SLEEPING CHILD AREA; DARBY LUMBER SECTIONS OFF OF
FLOURSPAR MINE ROAD=T3N,R19W,SECTIONS 1,3,5,7,9,11,13,and 15; BITTERROOT/ROCK
CREEK DIVIDE TRAIL 313; SKALKAHO/DAM LAKE SEASONAL CLOSURE; STONY MOUNTAIN AREA;
MULTIPLE AREAS ADJACENT TO ANACONDA PINTLER WILDERNESS; CONTINENTAL DIVIDE
TRAIL; NEEDLE CREEK WILDERNESS PROPOSAL; BARE CONE RIDGE/BETWEEN NEZ PERCE AND
BLUE JOINT; BLUE JOINT/JACK THE RIPPER; ROMBO/BEAVERTAIL/DITCH CREEK AREA; DEVIL
CREEK; WOODS CREEK; Trail 313; LITTLE BURNT FORK/SIGNAL CREEK/STONY MTN; BLODGETT
CANYON; CAMAS TRAIL THROUGH ORCHARD; LOST HORSE; THUNDER MOUNTAIN.

Why are all the old existing trails no longer shown on any of the travel maps or the regular forest service maps? These are trails that have been used in the past and still are being used now. These trails need to be on all the maps.

Sincerely,
MaryAnn Koss
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